



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Elissa B. Jacobs
Special Federal Litigation
(212) 356-3540
(212) 356-3509 (fax)
ejacobs@law.nyc.gov

December 19, 2016

By ECF

Honorable Sandra L. Townes
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Gonzalo Cortes, et al. v. City of New York, et al.,
1:14-cv-3014-SLT-RML

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of The City of New York, representing the defendants in this action. I write to respectfully request an extension of time, *nunc pro tunc*, to file defendants' motion for Summary Judgment, from December 15, 2016 to Tuesday, December 20, 2016. Plaintiff's counsel, Gabriel Harvis, consents to this request.

Due to technical problems, I have been unable to file my motion since Thursday. The initial problem was caused by work done on this Office's server on Thursday afternoon. I have since been out of the office and have been unable to access these files remotely, nor was I able to file a letter requesting an extension. I am therefore requesting this brief extension of time in order to file defendant's motion. In light of this, I am also requesting that plaintiff's time to oppose the motion be extended to January 6, 2017 and defendants' time to file a reply be extended to January 17, 2017. These dates were selected in conjunction with Mr. Harvis.

I apologize to the Court for the delay in sending this request and I thank the Court for its attention to this matter.

Respectfully submitted,

/s

Elissa B. Jacobs

cc: Gabriel Harvis Esq.
Attorney for Plaintiffs

By ECF